

1 Andrea D. George  
2 PO Box 19394  
3 Spokane, WA 99219  
4 (509) 570-4715  
5 E: [ageorge26@icloud.com](mailto:ageorge26@icloud.com)

6 *Plaintiff*

7  
8  
9 **UNITED STATES DISTRICT COURT**  
10 **EASTERN DISTRICT OF WASHINGTON**

11 ANDREA D. GEORGE,

12 *Plaintiff,*

NO.

13 v.

COMPLAINT

14 THE COLVILLE CONFEDERATED  
15 TRIBES; RODNEY CAWSTON; ANDREW  
16 JOSEPH, JR.; JACK FERGUSON; RICHARD  
17 SWAN, SR.; MARVIN KHEEL; JOSEPH  
18 SOMDAY; JOEL BOYD; RICHARD MOSES;  
19 ALICE KOSKELA; SHANNON THOMAS;  
20 JASON D'AVIGNON; and PETER  
21 ERBLAND,

22 *Defendants.*

JURY TRIAL DEMANDED

23 COMES NOW, the Plaintiff for causes of action against Defendants and allege the  
24 following allegations and complaint:

25 **I. PARTIES, JURISDICTION, & VENUE**

COMPLAINT: 1

**ANDREA D. GEORGE**  
POB 19394  
SPOKANE, WA 99219  
(509) 570-4715

1           1.1     ANDREA D. GEORGE ("Andrea") is a citizen of the United States and within  
2 the jurisdiction thereof. At all material times hereto, Andrea resided at 34 N. Front Street,  
3 Elmer City, Washington 99124 ("Residence") on the Colville Indian Reservation ("CIR").  
4 Andrea is a married person and currently a resident of Spokane, Washington. Andrea is a  
5 member of the Colville Confederated Tribes ("CCT").

6           1.2     THE CCT is a federally recognized tribe in the State of Washington located on  
7 the CIR in north-central Washington State. The CCT as a Party Defendant may be served  
8 through the Tribe's in-house legal counsel: CCT Office of Reservation Attorney, PO Box 150,  
9 Nespelem, Washington 99155.

10          1.3     RODNEY CAWSTON ("Cawston") is a resident of Coulee Dam, Washington,  
11 on the CIR. At all material times hereto, Cawston was a member of the Colville Business  
12 Council ("CBC"), the elected body of the CCT. Cawston was employed by the CCT at all  
13 material times hereto and continues to be employed by the CCT, and he can be served on the  
14 CIR. Cawston is the former Chairman of the CBC.

15          1.4     ANDREW JOSEPH, JR. ("Joseph") is a resident of Nespelem, Washington, on  
16 the CIR. At all material times hereto, Joseph was a member of the CBC. Joseph was employed  
17 by the CCT at all material times hereto and continues to be employed by the CCT, and he can  
18 be served on the CIR. Joseph is the former Vice-Chairman of the CBC and continues to serve  
19 on the CBC.

20          1.5     JACK FERGUSON ("Ferguson") is a resident of Keller, Washington, on the  
21 CIR. At all material times hereto, Ferguson was a member of the CBC. Ferguson was employed  
22 by the CCT at all material times hereto, and he can be served on the CIR. Upon information  
23 and belief, Ferguson is currently employed by the Spokane Tribe of Indians.  
24  
25

COMPLAINT: 2

**ANDREA D. GEORGE**  
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1           1.6     RICHARD SWAN, SR. ("Swan") is a resident of Inchelium, Washington, on  
2 the CIR. At all material times hereto, Swan was a member of the CBC. Swan was employed by  
3 the CCT at all material times hereto, and he can be served on the CIR.

4           1.7     MARVIN KHEEL ("Kheel") is a resident of Inchelium, Washington, on the  
5 CIR. At all material times hereto, Kheel was a member of the CBC. Kheel was employed by  
6 the CCT at all material times hereto and continues to be employed by the CCT, and he can be  
7 served on the CIR.

8           1.8     JOSEPH SOMDAY ("Somday") is a resident of Keller, Washington, on the  
9 CIR. At all material times hereto, Somday was a member of the CBC. Somday was employed  
10 by the CCT at all material times hereto and continues to be employed by the CCT, and he can  
11 be served on the CIR.

12          1.9     JOEL BOYD ("Boyd") is a resident of Inchelium, Washington, on the CIR. At  
13 all material times hereto, Boyd was a member of the CBC. Boyd was employed by the CCT at  
14 all material times hereto and continues to be employed by the CCT, and he can be served on the  
15 CIR.

16          1.10    RICHARD MOSES ("Moses") is a resident of Okanogan, Washington, off the  
17 CIR. At all material times hereto, Moses was a member of the CBC. Moses was employed by  
18 the CCT at all material times hereto and continues to be employed by the CCT at the 12 Tribes  
19 Resort and Casino, and he can be served on the CIR.

20          1.11    ALICE KOSKELA ("Koskela") is a resident of Coeur d'Alene, Idaho, off the  
21 CIR. At all material times hereto, Koskela was employed by the CCT in the Office of  
22 Reservation Attorney ("ORA") and she can be served off the CIR.

23          1.12    SHANNON THOMAS ("Thomas") is a resident of Coulee Dam, Washington,  
24 on the CIR. At all material times hereto, Thomas was employed by the CCT in the ORA and  
25 continues to be employed in the CCT ORA, and can be served on the CIR.

COMPLAINT: 3

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1 1.13 JASON D'AVIGNON ("D'Avignon") is a resident of Washington State, off the  
2 CIR. At all material times hereto, D'Avignon was employed by the CCT in the ORA, and can  
3 be served off the CIR. D'Avignon is currently employed by the Skagit County Prosecutor's  
4 Office in Mount Vernon, Washington.

5 1.14 PETER ERBLAND ("Erbland") is a resident of Idaho State, off the CIR. At all  
6 material times hereto, Erbland was a contracted attorney employed by the CCT, and can be  
7 served off the CIR. Erbland is currently employed by Lake City Law Group in Coeur d'Alene,  
8 Idaho.

9 1.15 This is a complaint for damages provide by a Federal Cause of Action for  
10 exhaustion of tribal court remedies, as well as violations of the CCT Constitution, and the  
11 Colville Tribal Code.

12 1.16 Venue is proper in this District wherein the incidents described herein took place  
13 pursuant to 25 U.S.C. § 1391(b)(1)-(2) and (c)(1).

## 14 II. FACTUAL ALLEGATIONS

15 2.1 Plaintiff re-alleges and incorporates the preceding paragraphs as though fully set  
16 forth herein.

17 2.2 Plaintiff was a member of the CCT CBC between July 12, 2018-February 21,  
18 2019. Plaintiff was harassed, mistreated, and targeted by Defendants while serving on the  
19 tribe's elected body.

20 2.3 Somday, Ferguson, former CBC Sheilah Cleveland, and former CBC Georgia  
21 Simpson met on July 11, 2018, with Koskela to seek legal advice about Plaintiff. Upon  
22 information and belief, these four CBC members requested that Koskela seek ethics charges  
23 against Plaintiff. Four of the fourteen CBC do not constitute a quorum, and any request or  
24 directive provided to Koskela was not formal action by the CBC. Upon information and belief,  
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COMPLAINT: 4

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1 Koskela, Somday, Ferguson, Georgia Simpson, and Sheilah Cleveland were acting outside the  
2 scope of their employment. Plaintiff was sworn into Sheilah Cleveland's position on the CBC  
3 on July 12, 2018. Georgia Simpson, now deceased, was Swan's common law wife.

4 2.4 Plaintiff was targeted by some Defendants even before serving on the CBC.

5 2.5 On or about July 12, 2018, in the early morning hours at approximately 7:30 am,  
6 Koskela emailed Erbland seeking Erbland's assistance with obtaining a legal opinion against  
7 Plaintiff to utilize to expel Plaintiff from the CBC. On or about July 12, 2018, Georgia Simpson  
8 and Sheilah Cleveland were no longer Koskela's primary client on CBC, and Koskela did not  
9 have formal CBC action to solicit a legal opinion from Erbland and therefore acting outside the  
10 scope of her employment.

11 2.6 Erbland represented the CCT and individuals in a prior civil suit filed by  
12 Plaintiff in Colville Tribal Court case number CV-OC-2017-40036. In the midst of that action,  
13 upon information and belief, Erbland attempted to solicit a complaint from Plaintiff's neighbor,  
14 Danny Miller, along with Koskela. Upon information and belief, Erbland was not unbiased  
15 against Plaintiff, given his representation adverse to Plaintiff in the 2017 matter and Erbland's  
16 solicitation of a complaint against Plaintiff from Mr. Miller. Plaintiff contends Erbland should  
17 have declined Koskela's request for a legal opinion against Plaintiff in July of 2018 and should  
18 have also demanded a copy of the tribal resolution authorizing the request against Plaintiff from  
19 the CBC.

20 2.7 It is unclear who Koskela's client was when she solicited the legal advice from  
21 Erbland. It is also unclear who Erbland's client was when he provided legal advice to Koskela  
22 which was adverse to Plaintiff. When Erbland provided Koskela an email and/or written  
23 opinion against Plaintiff in July/August of 2018, Plaintiff was on the CBC and was unaware  
24 and no CBC resolution authorized Erbland's analysis or recommendations.  
25

1           2.8     In August of 2018, Swan declared on record that Plaintiff violated the ethics  
2 rules and/or acted unethically regarding Swan's desire to approve proposed candidate for the  
3 Associate Judge position, Edward Jursek. On or about February 1, 2018, Edward Jursek held a  
4 hearing when he was not an approved judge with the Colville Tribal Court and declared that  
5 Plaintiff was unethical to defame, embarrass and humiliate Plaintiff. Plaintiff was terminated by  
6 the CCT a few days later subsequent to Edward Jursek's fake hearing, although Plaintiff (and  
7 her supervisor apparently) were unaware that Edward Jursek was not an authorized judge when  
8 that hearing occurred. Upon information and belief, the CBC directed Plaintiff's termination  
9 since Boyd admitted in February of 2018 to Plaintiff the reason for Plaintiff's termination and  
10 then quickly tried to retract his statement when Plaintiff reminded Boyd she was terminated  
11 without cause.

12           2.9     Defendants failed to follow the process outlined in Colville Tribal Code  
13 ("CTC") § 1-8. Defendants Koskela, D'Avignon, Thomas, and Erbland were attorneys  
14 employed or hired by the CCT to advise the CBC regarding the ethics complaint, the process  
15 utilized, investigate, and make recommendations consistent with the law.

16           2.10    Ethical violations under CTC § 1-8 against CBC elected officials are only  
17 allowed regarding actions taken by a CBC while in office. Defendants knew or should have  
18 known that the ethics complaint signed by Swan did not relate to Plaintiff's actions while on  
19 the CBC. Defendants Koskela, D'Avignon, and/or Thomas failed to advise the CBC to  
20 immediately dismiss Swan's complaint consistent with the CCT Constitution and CTC § 1-8.

21           2.11    Defendants conspired and colluded to bring forward an ethics charge against  
22 Plaintiff in early September of 2018 related to an allegation from approximately seven months  
23 prior when Plaintiff was the Managing Attorney in the CCT Public Defender's Office  
24 (surrounding Edward Jursek's fake hearing), and prior to Plaintiff being sworn in to the CBC.  
25

1           2.12 Plaintiff sought discovery from Defendants regarding Swan's ethics charge. On  
2 or about September 27, 2018, after attempts via email to obtain information, Plaintiff went to  
3 the ORA office suite to obtain information, documents, and names of witnesses. The following  
4 day, September 28, 2018, was a tribal holiday for Native American Day, and Koskela, Thomas,  
5 and D'Avignon would not be working. In the afternoon, when Plaintiff asked to speak to  
6 Thomas in the ORA office for more information, Thomas became upset and yelled at Plaintiff.  
7 When Koskela appeared, Koskela confirmed she would be testifying against Plaintiff on  
8 October 1, 2018 (the following Monday) for the Investigatory Hearing. Koskela also provided  
9 sly and vague answers to Plaintiff about the nature of her testimony. Plaintiff did not raise her  
10 voice or get mad.

11           2.13 Immediately following the interaction with Koskela and Thomas, Plaintiff  
12 received an email from Thomas sent to the entire CBC and including Koskela, alleging that  
13 Plaintiff yelled at Thomas. Thomas made false statements against Plaintiff to conceal her own  
14 inappropriate actions.

15           2.14 Defendants retained and/or employed Erbland to investigate Swan's ethics  
16 complaint against Plaintiff. Alternatively, Defendants paid Erbland to serve as a witness related  
17 to Swan's ethics complaint against Plaintiff. Upon information and belief, Erbland failed to  
18 recommend to Defendants that Plaintiff did not violate the CBC ethics code in CTC § 1-8, nor  
19 did Erbland inform Plaintiff and all CBC that he was retained by Koskela the day before  
20 Plaintiff was sworn in to the CBC.

21           2.15 Defendants proceeded to an Investigatory Hearing related to Swan's ethics  
22 complaint on October 1, 2018. Defendants failed to follow the process outlined in the existing  
23 CTC § 1-8, and the CBC voted to dismiss Swan's ethics charge against Plaintiff. Swan's ethics  
24 complaint and CBC's handling and failure to immediately dismiss caused Plaintiff unnecessary  
25 grief, stress, and anxiety, causing Plaintiff harm and suffering. Upon information and belief, the



1 advice provided by D'Avignon, Koskela, and/or Thomas failed to recommend immediate  
2 dismissal of Swan's ethics charge against Plaintiff, and/or refusal to accept such ethics charge.

3 2.16 The ORA reports to the CBC, and the ORA contracts are approved by the CBC.  
4 ORA attorneys, including Koskela, Thomas, and D'Avignon could be terminated from  
5 employment by the CBC. The ORA must adhere to the ethical and legal requirements  
6 contained in their contractual agreements with the CCT, the provisions in CTC § 1-4 (the ORA  
7 Code), and applicable ethical rules required by the Washington State Bar Association  
8 ("WSBA") Rules of Professional Conduct ("RPCs"). Consistent with CTC § 1-4-5, ORA  
9 attorneys must be licensed to practice in Washington State Courts (WSBA) at the time of hire  
10 or within two years of hire.

11 2.17 Thomas never signed an ethics charge against Plaintiff. Upon information and  
12 belief, Thomas did not want to sign a written document alleging Plaintiff yelled at Thomas  
13 since it would be another false statement.

14 2.18 During a full session of the CBC, on October 4, 2018, Cawston announced that  
15 Swan's ethics charge against Plaintiff was dismissed. The decision was not contained in the  
16 CBC Resolution Index for October 4, 2018. At the end of the full or special session, Cawston  
17 also announced that the executive committee wanted an investigation into Plaintiff and Thomas  
18 (related to Thomas' email allegations). No resolution was passed by CBC to direct an  
19 investigation or any action be taken. No formal ethics complaint was filed against Plaintiff by  
20 Thomas or anyone else between September 27, 2018-January 1, 2019.

21 2.19. Koskela, D'Avignon, and/or other ORA attorneys selected Thomas Miller to  
22 investigate Cawston's sole directive regarding Plaintiff and Thomas. Upon information and  
23 belief, CBC may have approved Thomas Miller as the attorney to investigate Cawston's  
24 directive.  
25



1           2.20 Thomas Miller worked previously in the ORA and reported to Koskela. Plaintiff  
2 contends Thomas Miller was biased in favor of ORA staff. Thomas Miller admitted to Plaintiff  
3 during his investigation that he worked for Koskela as well as Dana Cleveland, who Plaintiff  
4 had pending litigation against at the time. Plaintiff informed Thomas Miller she believed he had  
5 a conflict of interest. It is unclear who Thomas Miller worked for, and Plaintiff contends  
6 ORA's involvement in selecting, soliciting, supervising, or managing a contract to investigate  
7 Thomas was inappropriate, unethical, and a conflict of interest.

8           2.21 Thomas Miller interviewed ORA employees and Plaintiff, including Anna  
9 Vargas. Thomas Miller did not include information from Ms. Vargas outlining that Thomas  
10 made a false statement and the opposite occurred of what Thomas reported, despite issuing a  
11 written report to D'Avignon that was approximately seventy-seven pages. Thomas Miller did  
12 not recommend expulsion of Plaintiff and the lengthy report was not inclusive. Plaintiff  
13 contends Thomas Miller concealed Ms. Vargas' statements to protect Thomas and ORA staff.  
14 In turn, Thomas Miller's failure to provide thorough and complete information in his  
15 investigatory report harmed Plaintiff. Although Cawston's directive should not have caused an  
16 investigation by Thomas Miller or any attorney (especially one entangled with the ORA  
17 supervising or managing), any investigation should have been unbiased, fair, thorough,  
18 complete, and made recommendations against Thomas for her false statement.

19           2.22 Based upon Thomas Miller's indication of how long his written report would  
20 take, Plaintiff inquired of Mr. Miller about the status of his report in December of 2018.  
21 Thomas Miller refused to provide his written report to Plaintiff or even the full CBC. Instead,  
22 Thomas Miller informed Plaintiff he provided his report to D'Avignon. D'Avignon and  
23 Defendants failed to timely provide the written report from Thomas Miller to the entire CBC,  
24 including Plaintiff.  
25

1           2.23   Upon information and belief, Thomas Miller was paid handsomely by CCT for  
2 the written report.

3           2.24   Upon information and belief, Defendants requested a revised, amended, or  
4 otherwise updated report from Thomas Miller. Also upon information and belief, Thomas  
5 Miller provided a supplemental report to Ferguson and Defendants.

6           2.25   Under the CBC Rules of Professional Conduct, in CTC § 1-8, there must be a  
7 written and signed complaint. Plaintiff contends the investigation by Thomas Miller was  
8 inappropriate and illegal under the existing CTC § 1-8 in effect in 2018 when no signed and  
9 written complaint had been filed against Plaintiff related to Thomas' allegations from  
10 September of 2018. Rather, Defendants sought another legal opinion against Plaintiff in a witch  
11 hunt that violated applicable laws. Thomas Miller also did not appear to investigate Thomas,  
12 but rather focused on Plaintiff despite Cawston's directive on October 4, 2018, indicating he  
13 wanted Thomas and Plaintiff investigated.

14           2.26   After receiving Thomas Miller's report (which points out no written complaint  
15 had been received), on or about January 10, 2019, Kheel signed an ethics charge against  
16 Plaintiff related to Thomas' email and the investigation by Thomas Miller. Thomas Miller's  
17 investigation and written report predated Kheel's ethics charge against Plaintiff.

18           2.27   Plaintiff filed a civil action in Colville Tribal Court in January of 2019 seeking  
19 an injunction or declaratory relief since Defendants failed to follow the process outlined in  
20 applicable tribal laws. The Tribal Court denied relief for any injunction or other relief related to  
21 the Defendants' action related to Cawston's directive and/or Kheel's late filed ethics charge.

22           2.28   Plaintiff was not properly served with the written notice of the Investigatory  
23 Hearing scheduled for February 1, 2019.

24           2.29   On February 1, 2019, CBC held an Investigatory Hearing regarding the ethics  
25 complaint signed by Kheel against Plaintiff. At the outset of the Investigatory Hearing on

1 Cawston's directive and/or Thomas' email, Koskela handed out hard copies of her complaint  
2 against Plaintiff suggesting that Plaintiff violated federal law and that Koskela felt threatened.  
3 Koskela knew or should have known that her untimely complaint violated the tribal code and  
4 could not be considered as part of the Investigatory Hearing that day. Koskela's allegations  
5 were new and failed to comply with CTC § 1-8.

6 2.30 Approximately fifteen minutes into the hearing, Ferguson directed chief of  
7 police Dustin Best to remove Plaintiff's attorney, Theresa Thin-Elk ("Thin-Elk"), from CBC  
8 chambers. Defendants violated Plaintiff's right to be represented by legal counsel and due  
9 process. Thin-Elk was physically forced through body positioning and verbal commands to  
10 leave CBC chambers and this action violated tribal law pursuant to CTC § 1-8-30(e).

11 2.31 Approximately an hour and five minutes into the Investigatory Hearing, Plaintiff  
12 was excused from the hearing. Plaintiff was unable to listen to testimony or cross examine  
13 witnesses.

14 2.32 At the Investigatory Hearing occurred on February 1, 2019. Plaintiff was not  
15 allowed to call all witnesses requested and Ferguson ran the hearing. The process violated  
16 Plaintiff's due process rights and the tribal laws. Thomas Miller and ORA staff Nichelle  
17 Barnaby did not make themselves available to testify. Plaintiff was not allowed to record or use  
18 any electronic devices for notes (such as Plaintiff's laptop) before Plaintiff was forced to leave.  
19 Ferguson desired no recording of the Investigatory Hearing. Upon information and belief,  
20 Ferguson was protecting Thomas.

21 2.33 As declared by Ms. Vargas to Plaintiff and Thomas Miller, and again testified to  
22 by Ms. Vargas during the Investigatory Hearing on February 1, 2019, Thomas yelled at  
23 Plaintiff. To date, upon information and belief, Thomas was never penalized or disciplined for  
24 her false statements in her email, to Thomas Miller, or during her testimony on February 1,  
25 2019.

1           2.34    The CBC recommended expulsion of Plaintiff under CTC § 1-8 despite the  
2 numerous flaws in the process and violation of the applicable laws.

3           2.35    After the committee vote and recommendation but before the full session for  
4 expulsion, Plaintiff sought relief from the Tribal Court. The Tribal Court refused to provide any  
5 relief or enforce applicable tribal laws. Plaintiff suffered harm and was damaged.

6           2.36    Plaintiff was expelled on February 19, 2019, in a vote that violated tribal laws.  
7 Chairman Cawston was only allowed to vote in the event in a tie, but Cawston declared that  
8 ORA advised he was allowed to vote. Without Cawston's vote, there were inadequate votes to  
9 expel Plaintiff according to tribal laws. As such, the expulsion was illegal.

10          2.37    Defendants issued press releases with defamatory information about Plaintiff,  
11 including that Plaintiff was a danger to tribal members and that Plaintiff threatened Koskela.

12          2.38    Plaintiff sought further relief from the Tribal Court to prevent Defendants from  
13 filling Plaintiff's "vacant seat" on the CBC. The Tribal Court refused to provide any relief.

14          2.39    Plaintiff sought further relief from the Tribal Court to prevent Defendants from  
15 refusing to certify Plaintiff as a candidate for the CBC. The Tribal Constitution has very limited  
16 criteria to run for CBC. Despite the expulsion, Plaintiff was still eligible to run and be certified  
17 as a candidate under the Tribe's Constitution. The Tribal Court refused to provide any relief.

18          2.40    Plaintiff sought to run again for the CBC and submitted the documentation  
19 required to be certified to run in the Nespelem District for the 2019 CBC election. The CCT  
20 refused to certify Plaintiff. Plaintiff was not allowed to run for the CBC due to the February  
21 2019 expulsion in violation of the Tribe's Constitution.

22          2.41    Plaintiff was entitled to continue to sit on the CBC until the expiration of her  
23 term in July of 2020. Plaintiff received a salary of \$100,000.00 while on the CBC, plus  
24 significant benefits including retirement, sick and vacation leave, life insurance, and  
25 medical/dental/vision insurance. Plaintiff was denied salary and benefits for approximately

1 sixteen and a half months, with significant financial value, as well as the ability to lead the  
2 CCT and make decisions on the elected body.

3 2.42 Due to the Defendants' defamatory statements and action, Plaintiff was not able  
4 to secure a full time legal position for an entire year. Plaintiff was denied employment  
5 opportunities, including attorney positions with the Kalispel Tribe based specifically upon  
6 information received from the Defendants. Due to the financial hardship, Plaintiff was forced  
7 and did in fact withdraw the majority of her retirement savings and moved off the CIR with her  
8 family.

9 2.43 Plaintiff suffered emotional distress, anxiety, and other harm due to the  
10 Defendants' actions. Plaintiff was embarrassed, humiliated, and outraged. Plaintiff was  
11 traumatized by the Defendants' actions and misconduct.

12 2.44 On or about March 2020, Plaintiff sold her Residence on the CIR. Plaintiff  
13 contends the Residence was sold for significantly less than what the Residence was worth, and  
14 Plaintiff incurred a significant financial loss through the sale of the Residence on the CIR due  
15 to the Defendants' unlawful actions and misconduct. In 2021, the Residence was sold again for  
16 considerably more.

17 2.45 Plaintiff sought a review by the Colville Tribal Court of Appeals. The tribal  
18 court of appeals dismissed the appeal. Plaintiff fully exhausted tribal court remedies.

19 2.46 Defendants knew or should have known the Plaintiff would suffer harm and  
20 Plaintiff did in fact suffer damages.

21 2.47 Defendants injured Plaintiff in her person, reputation, employment history, and  
22 caused her to lose out on significant wages and benefits.

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COMPLAINT: 13

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POB 19394  
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**III. PRAYER FOR RELIEF**

WHEREFORE, Plaintiff demands judgment as follows:

3.1 For monetary damages resulting from Defendants' actions in violation of the CCT Constitution and applicable laws in an amount to be determined at trial.

3.2 For monetary damages for the 16.5 months of salary and benefits the Plaintiff was denied through the illegal expulsion in an amount to be determined at trial.

3.3 For monetary damages for the denial of Plaintiff's certification for the 2019 CBC Election, which may have mitigated the loss of salary and benefits.

3.4 For declaratory relief outlining that Plaintiff is in fact eligible to run for CBC if she otherwise meets criteria outlined in the CCT Constitution.

3.5 For declaratory relief outlining that Plaintiff's expulsion on February 21, 2019, from the CBC was illegal and violated the CCT Constitution and/or Colville Tribal Code.

3.6 For monetary damages resulting from Defendants' defamation of Plaintiff's reputation and good character without a basis or compensation in an amount to be determined at trial.

3.7 For monetary damages resulting from Defendants' intentional and negligent acts in violation of applicable laws.

3.8 For monetary damages resulting from Defendants' malicious intent to expel Plaintiff from the CBC

3.9 For an award of Plaintiff's costs and attorney's fees in accordance with all applicable statutes, court rules, common law, and the Court's equitable powers.

3.10 For pre- and post-judgment interest at the statutory rate.

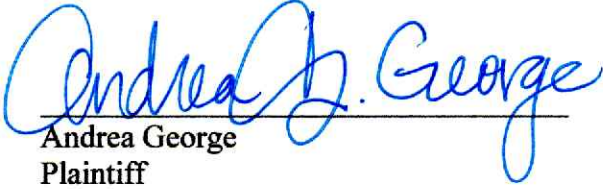
3.11 For the right to amend this Complaint.

3.12 For any other and further relief which the court deems just and equitable.

COMPLAINT: 14

**ANDREA D. GEORGE**  
POB 19394  
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1 DATED this 12<sup>th</sup> day of April, 2024.

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3 Andrea George  
4 Plaintiff

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COMPLAINT: 15

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